

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

SIGMUND NASZKE,	)	
	)	
Plaintiff,	)	No. 08 C 3404
	)	
v.	)	
	)	
OFFICER HOLY #2525, OFFICER SHAWN	)	Judge St. Eve
MARON, OFFICER LETRICH #21771,	)	
OFFICER HEALEY #20855, OFFICER	)	
FANNING #20641, OFFICER YOUNG	)	
#20734, and the CITY OF CHICAGO,	)	
	)	
Defendants.	)	

**DEFENDANT CITY OF CHICAGO'S MOTION  
FOR AN EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD**

Defendant City of Chicago (the "City"), through its attorney Mara S. Georges, Corporation Counsel of the City of Chicago, pursuant to Federal Rule of Civil Procedure 6(b), moves this Court to grant all defendants an extension of time until September 19, 2008, to answer or otherwise plead to plaintiff's First Amended Complaint. In support of this motion, the City states as follows:

1. On July 2, 2008, plaintiff filed his nine-count First Amended Complaint, which alleges federal claims under 42 U.S.C. § 1983 against six Chicago police officers and state law claims against the City.
  2. The City's responsive pleading is due on July 22, 2008.
  3. Undersigned counsel for the City does not know if any of the six defendant-officers have received service of a summons and copy of the First Amended Complaint.
- Summons were issued to defendant-officers Bryan and Maron on June 12, 2008, before plaintiff

filed his First Amended Complaint. *See* Dkt. Rprt. #9. After plaintiff filed his First Amended Complaint, summons were issued to defendant-officers Young, Fanning, Healey, and Letrich on July 11, 2008. *See* Dkt. Rprt. #19.

4. Undersigned counsel will represent the City and all six defendant-officers in this case in the absence of any conflict of interest between the parties.

5. Accordingly, instead of filing one responsive pleading for the City by July 22, 2008, and another responsive pleading for the six defendant-officers after they have been served, undersigned counsel proposes the filing of one comprehensive, joint responsive pleading for all defendants by September 19, 2008.

6. An extension of time until September 19, 2008, is appropriate because (a) undersigned counsel cannot meet with any of the defendant-officers to determine whether a conflict of interest exists between them and the City until after all six defendant-officers have been properly served with process; and (b) to properly answer plaintiff's First Amended Complaint, sufficient time is needed not only to coordinate and schedule meetings with all six defendant-officers, but also to gather all the pertinent documents and investigate plaintiff's allegations.

7. Accordingly, the City requests that all defendants be granted until September 19, 2008, to answer or otherwise plead to plaintiff's First Amended Complaint.

8. This is the first extension of time the City has sought in this case.

9. This motion is not brought for the purpose of delay or any other improper purpose, but in the interest of litigation economy.

10. Plaintiff will not be prejudiced if the requested extension of time is granted.

For these reasons, the City requests the Court to grant all defendants time until September 19, 2008, to file their answers or otherwise plead.

Respectfully submitted,

MARA S. GEORGES  
Corporation Counsel of the  
City of Chicago

Dated: July 21, 2008

By: s/ Bhairav Radia  
Bhairav Radia  
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